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Counsel to General Electric International, Inc.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE WATTSTOCK, LLC,

Debtor.

WATTSTOCK LLC,

Plaintiff,

v.

ALTA POWER LLC,

Defendant, Counter-Plaintiff, and Third-Party Plaintiff,

v.

WATTSTOCK LLC,

Counter-Defendant, and

**GENERAL ELECTRIC
INTERNATIONAL, INC., d/b/a GE**

Case No. 21-31488-sgj11V

**Chapter 11
Subchapter V**

Adv. No. 21-03083-sgj

***Removed from the District Court of
Dallas County, Texas, 116th Judicial
District***

Case No. DC-20-08331

POWER SERVICES,

Third-Party Defendant.

**GENERAL ELECTRIC INTERNATIONAL, INC.'S
MOTION TO WITHDRAW THE REFERENCE FOR ALL FURTHER PROCEEDINGS**

Pursuant to 28 U.S.C. § 157(d), Rule 5011 of the Federal Rules of Bankruptcy Procedure, and Rule 5011-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of Texas, Third-Party Defendant General Electric International, Inc. (“GE”), by and through its undersigned counsel, hereby moves (the “Motion”) the United States District Court for the Northern District of Texas (the “District Court”) for an order withdrawing the bankruptcy reference for all further pretrial and trial proceedings (3:21-cv-03183-bs, Dkt. 5) of the above-captioned Adversary Proceeding No. 21-03083-sgj (the “Adversary Proceeding”), to the United States Bankruptcy Court for the Northern District of Texas (the “Bankruptcy Court”).

This Motion is based on the Brief in Support of Motion to Withdraw the Reference for All Further Proceedings (the “Brief”) and the Declaration of Andrew LeGrand (the “LeGrand Declaration”) all of which are being filed concurrently herewith and are incorporated herein by reference; the pleadings, records and files in this action; all other matters of which the Court is permitted to take judicial notice; and any oral or written evidence or argument that the Court may consider at or before the status conference on this Motion.

This Motion is being filed pursuant to Local Bankruptcy Rule 5011-1, which provides that “[a] motion to withdraw reference of a case or a proceeding in a case shall be directed to the district court, but shall be filed with the Bankruptcy Clerk.”

Dated: February 1, 2023

Respectfully submitted,

/s/ Andrew LeGrand

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document has been served on counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Andrew LeGrand
Andrew LeGrand

*Attorney for General Electric
International, Inc.*

CERTIFICATE OF CONFERENCE

I certify that on February 1, 2023, counsel for GE met and conferred with counsel for Alta Power LLC. Alta and GE were unable to reach agreement and have reached an impasse, leaving the open issues for the court to resolve. The motion is opposed by Alta Power LLC.

/s/ Andrew LeGrand
Andrew LeGrand

*Attorney for General Electric
International, Inc.*